

IN THE CIRCUIT COURT OF THE 17<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO: CACE-22-004856

LIVAN ALFONSO,

Plaintiffs,

vs.

BRYAN DAVID BOOTH, and  
D&D SERVICES LLC,

Defendant.

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**COMPLAINT**

COMES NOW the Plaintiff LIVAN ALFONSO by and through his undersigned attorney,  
and sues the Defendant and alleges:

1. That this is an action for damages that exceeds \$30,000.00
2. That Plaintiff is residents of Miami-Dade County, Florida and is sui juris.
3. That Defendant BRYAN DAVID BOOTH is a resident of Lebanon, MO and is sui juris.
4. The Defendant D&D SERVICES LLC is a Florida Limited Liability Company and is subject to the jurisdiction of this Court.

**COUNT I—NEGLIGENCE AGAINST BRYAN DAVID BOOTH**

5. That on or about August 3<sup>rd</sup>, 2020, Defendant was operating a vehicle at approximately I-95 and SR-870 in Broward County, Florida.

6. That at that time and place Defendant negligently operated and/or maintained said motor vehicle so that it crashed into the vehicle operated by Plaintiff.
7. That as a direct result of the aforescribed negligence the Plaintiff suffered losses, including by not limited to bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and aggravation and acceleration of a previously existing condition. He has also sustained property damage to his vehicle and a diminution of value of his automobile. The losses are either permanent or continuing in nature and the Plaintiff will suffer the losses in the future.

**COUNT II – VICARIOUS LIABILITY AND/OR DANGEROUS INSTRUMENTALITY  
AGAINST D&D SERVICES LLC**

8. That Defendant BRYAN DAVID BOOTH was in the course and scope of his employment or doing an errand for D&D SERVICES LLC at the time and place of the incidents set forth in Count I.
9. That D&D SERVICES LLC is responsible for the negligence of its employee/agent/errand performer BRYAN DAVID BOOTH because the negligent acts set forth in Count I occurred while:
  - a. He was performing services which he was employed to perform; and/or
  - b. He was acting at least in part because of his desire to serve his employer and was doing something that was reasonably incidental to his employment or something the doing of which was reasonably foreseeable and reasonably to be expected of persons similarly employed.

c. He was driving a vehicle owned by D&D SERVICES LLC and dangerous instrumentality law applies.

10. As a result of the aforesaid negligent acts performed by BRYAN DAVID BOOTH during the course and scope of his employment or performing an errand for or simply driving the vehicle owned by OWNER, Plaintiff suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, and the loss of ability to earn money in the past and in the future. The losses are either permanent or continuing in nature and the Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiffs demand trial by jury and judgment against the Defendants for damages, costs of this action, and such other further equitable and legal relief as this Court may deem appropriate. This Complaint is being served with a Summons, Interrogatories, Requests for Admission, and Request for Production to each Defendant.

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/s/ Steve Stefanik

By: \_\_\_\_\_

STEVE STEFANIK, ESQ.  
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